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U.S. Department of Justice

United States Attorney Douthern District of New York

ne Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

February 11, 2022

SO ORDERED

## **BY ECF**

The Honorable George B. Daniels United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007 The status conference is adjourned until May 18, 2022 at 10:00 a.m.

FEB 1 4 2022

United States v. Gutemberg Dos Santos et al., S1 20 Cr. 398 (GBD)

United States v. Karina Chairez, S2 20 Cr. 398 (GBD)

Dear Judge Daniels:

Re:

The Government writes, on behalf of all the parties, to respectfully request an adjournment of the pre-trial motion deadline, currently scheduled for February 18, 2022, and the conference scheduled for March 15, 2022. Counsel for Pablo Renato Rodriguez, Peter Katz, informed the Government that he would like to request an adjournment of the motion deadline to March 15, 2022, in part because of challenges consulting with his client at the jail due to COVID restrictions. The Government has consulted with all counsel regarding the proposed adjournment and a proposed motion schedule, and all counsel have informed the Government that they consent to the following schedule: motions due March 15, 2022; Government response due April 15, 2022; conference to be scheduled during the third week in May 2022. Accordingly, the Government respectfully requests that the Court adjourn the current motion deadline and conference consistent with this proposed schedule. In addition, the Government respectfully requests that time be excluded under the Speedy Trial Act between March 15, 2022, through the date of the next conference because the "ends of justice served by the granting of such continuance outweigh the best interests of the public and the defendant in a speedy trial." 18 U.S.C. § 3161(h)(7)(A). The Government consulted with defense counsel for each defendant, who do not object to the exclusion of time.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

Bv:

Kiersten A. Fletcher/Cecilia E. Vogel/

Elizabeth A. Espinosa

Assistant United States Attorneys

(212) 637-2238/1084/2216